

# STONE MAGNANINI

## COMPLEX LITIGATION

December 12, 2022

**VIA ELECTRONIC FILING**

Hon. Michael A. Hammer, U.S.D.J.  
United States District Court  
Martin Luther King Courthouse  
50 Walnut Street Room 2C  
Newark, NJ 07101

Re: *United States v. Jobadiah Sinclair Weeks*  
Docket No. 19-CR-877 (CCC)

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Jobadiah Sinclair Weeks ("Mr. Weeks"). We respectfully request that the Court consent to Mr. Weeks spending the Christmas holiday with his family at his cabin, located at 442 S. Frontage Rd E Vail, Colorado, from December 16, 2022 to December 25, 2022. This request would be compliant with the Court's August 15, 2022 Order approving curfew but would shift his residence to Vail for this limited period.

Mr. Weeks will be accompanied at all times by one or more of the third-party custodians included in the November 6, 2020 Order—Nathaniel Weeks, Silence Weeks, and Stephanie Weeks. A full itinerary will also be provided to Pretrial Services in advance and all other conditions of release will continue to apply.

Pretrial Services has informed us that they are amenable to this modification in light of Mr. Weeks' overall compliance with the conditions of his release. The United States, through Assistant United States Attorney Anthony Torntore, defers to Pretrial Services' position.

We thank Your Honor for your courtesy in this matter.

Respectfully submitted,

/s/ David S. Stone  
David S. Stone, Esq.  
Managing Partner

**CO ORDERED**

/s/ Michael A. Hammer  
**Michael A. Hammer, U.S.M.J.**

cc: Government Counsel of Record (via ECF and e-mail)  
U.S. Pretrial Services Officer David Hernandez (via e-mail)

Date: 12/15/2022

400 Connell Drive, Suite 6200, Berkeley Heights, New Jersey 07922  
P 973.218.1111 / F 973.218.1106 / [www.smcomplex.com](http://www.smcomplex.com)